

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Priscilla Stuart	:	Chapter 13
	:	
Debtor	:	Case No.: 17-14905AMC

**EXPEDITED MOTION TO APPOINT PERSONAL INJURY ATTORNEY AND
APPROVE PERSONAL INJURY SETTLEMENT**

The Debtor, by and through her undersigned counsel, hereby moves to appoint her personal injury attorney and obtain approval to settle her personal injury case and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 20th, 2017.
2. The Chapter 13 filing was assigned case number 17-14905AMC.
3. In 2013, Debtor was in an automobile accident where the other driver was at fault by running a red light.
4. The Debtor approached Kevin Malloy, Esq. to represent her in a personal injury action against said driver and her insurance company.
5. Debtor suffered significant physical injuries, which she has treated for since the accident took place.
6. Mr. Malloy is an experienced and duly licensed personal injury Attorney in the Commonwealth of Pennsylvania.
7. Recently, and after the Debtor's Plan was confirmed by this Honorable Court, Mr. Malloy was able to obtain a settlement offer of the Debtor's personal injury case. Please see Settlement Distribution Sheet attached and marked as "**Exhibit A.**"

8. Said Distribution Sheet reflects the medical care the Debtor required while treating for her injury. See Id.

9. After all costs and reasonable attorney fees are accounted for, Debtor is entitled to receive a maximum of \$30,296.04. See Id.

10. The Debtor has amended her Schedules A/B & C to list, and fully exempt this \$30,296.04 award under 11 U.S.C. § 522(d)(11)(D) & (d)(5), as this award is to compensate her for damages traceable to actual physical injury she sustained from the accident.

11. It is lastly humbly requested that this hearing be expedited to as soon as possible, in that the Debtor is in desperate need of a new roof on her home which will cost approximately \$10,000.00.

WHEREFORE, the Debtor humbly requests that this Honorable Court allow the appointment of Kevin Malloy, Esq. as Debtor's personal injury Attorney, allow the settlement of the personal injury case per the Distribution Sheet, and allow the Debtor to receive her Exempted damages award.

Dated: June 3, 2019

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
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